Lars T. Fuller (No. 141270) 1 Sam Taherian (No. 170953) The Fuller Law Firm, P.C. 2 60 No. Keeble Ave. San Jose, CA 95126 3 Tel: (408) 295-5595 Fax: (408) 295-9852 4 Attorney for Debtor 5 6 7 U.S. BANKRUPTCY COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 In re: Case No.: 11-30620-TEC 11 CHAPTER 11 THEODOROS KOLIATSIS. 12 NOTICE OF HEARING ON MOTION TO Debtor 13 VALUE COLLATERAL FOR THE PURPOSE OF MODIFYING WELLS **FARGO BANK'S LIEN** 14 15 Date: May 27, 2011 9:30 a.m. 16 Time: 235 Pine St., 23<sup>rd</sup> Floor Court: 17 San Francisco, CA 18 TO THE U.S. TRUSTEE, WELLS FARGO BANK, N.A., ITS ATTORNEY OF RECORD, 19 AND ALL PARTIES IN INTEREST: 20 Please take notice that Debtor Theodoros Koliatsis will and does hereby move the Court 21 to value the collateral of Wells Fargo Bank, N.A. consisting of real property commonly known 22 as 3931-3953 Geary Boulevard, San Francisco CA 94118 [hereinafter "Property"] for the 23 purpose of cramming its lien on the basis that the lien is totally under-secured. 24 25

1	A hearing on said motion is so	cheduled for May 27, 2011 at 9:30 a.m. at the United States	
2	Bankruptcy Court for the Northern District of California, San Francisco Division, 235 Pine		
3	Street, 23 <sup>rd</sup> Floor, San Francisco, CA	. This motion is based on this Notice of Hearing on Motion	
4	to Value Collateral for the Purpose of	f Modifying Wells Fargo Lien, the Motion to Value	
5	Collateral for the Purpose of Modifying Wells Fargo Lien, the Memorandum of Points and		
6	Authorities, the Declarations in Support of Motion to Value Collateral for the Purpose of		
7	Modifying Wells Fargo Lien, on the papers, records, and other documents on file herein, and on		
8	such oral and documentary evidence as may be presented at the hearing of this motion.		
9	This motion is brought pursuant to B.L.R. 9014-1(b)(2), Bankruptcy Rule 3012, and		
0	notice is pursuant to FRBP 7004(b).		
1	If you oppose this motion, your opposition should be filed at least 14 days prior to the		
2	actual scheduled hearing date. If you oppose the motion you should appear at the hearing.		
3	Your opposition, if any, to the	ne motion in addition to being filed with the Court, shall b	
4 5	served on Debtor, Debtor's attorney and the Trustee at the address set forth below:		
6			
7	THE BANKRUPTCY COURT:	UNITED STATES BANKRUPCY COURT	
8		FOR THE NORTHERN DISTRICT OF CALIFORNIA 235 Pine St., 19 <sup>th</sup> Floor	
9		P.O. Box 7341 San Francisco, CA 94120	
20	DEBTOR'S COUNSEL:	LARS T. FULLER, ESQ.	
21		THE FULLER LAW FIRM, P.C. 60 N. Keeble Avenue	
22		San Jose, CA 95126	
23	UNITED STATES TRUSTEE:	UNITED STATES TRUSTEE REGION 17 San Francisco Division Office	
24		235 Pine Street, Suite 700 San Francisco, CA 94120	
5			

1	DEBTORS:	THEODOROS KOLIATSIS 3953 Geary Boulevard San Francisco GA 04118
2		San Francisco, CA 94118
3	Dated: April 29, 2011	
4		THE FULLER LAW FIRM, P.C.
5		
6		/s/ Lars T Fuller
7		<u>/s/ Lars T. Fuller</u> Lars T. Fuller Attorney for Debtors
8		Attorney for Debtors
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		